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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 08-0238 MHP
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED] ORDER
v.)	EXCLUDING TIME FROM MAY 5, 2008
)	THROUGH JUNE 16, 2008
JASON HOANG and YANG HUA MEI,)	
)	
Defendant.)	
_____)	

On May 5, 2008, the parties in this case appeared before the Court for a status conference. The parties stipulated and the Court agreed that time should be excluded from the Speedy Trial Act calculations from May 5, 2008, through June 16, 2008, for effective preparation of defense counsel. The parties represented that granting the continuance was the reasonable time necessary for effective preparation of defense counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice served by granting such a continuance outweighed the best interests of the public

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1 and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(8)(A).

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3 SO STIPULATED:

4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6 DATED: May 13, 2008

7 /s/ Owen Martikan
8 OWEN P. MARTIKAN
Assistant United States Attorney

9 DATED: May 9, 2008

BARRY J. PORTMAN

10 /s/
11 NED SMOCK
12 Attorneys for Jason Hoang

13 DATED: May 12, 2008

14 /s/
15 ALAN DRESSLER
Attorney for Yang Hua Mei

16 As the Court found on May 5, 2008, and for the reasons stated above, an exclusion of time
17 from May 5, 2008, through June 16, 2008, is warranted because the ends of justice served by the
18 continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18
19 U.S.C. § 3161(h)(8)(A). The failure to grant the requested continuance would deny defense
20 counsel the reasonable time necessary for effective preparation, taking into account the exercise
21 of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(8)(B)(iv).

22
23 SO ORDERED.

24
25 DATED: 5/14/2008

